

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

TINA JOHNSON,
Plaintiff,

v.

DAVID THOMAS HERBERT, et al.,
Defendants.

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CIVIL ACTION NO. 1:22-CV-00411

**DEFENDANT KENDRICK TRANSPORT LLC'S NOTICE OF COUNTER
DEPOSITION DESIGNATIONS**

TO THE HONORABLE COURT:

COMES NOW, Defendant Kendrick Transport, LLC ("Kendrick" and/or "Defendant") and files its Notice of Counter Deposition Designations pursuant to the Court's Second Amended Scheduling Order and the deadline imposed by the same for witnesses who may not be called live at the time of trial and would respectfully provide notice of the following designations from the depositions of the below named witnesses:

Deposition Testimony of Ryan Sandefur – August 9, 2023

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Deposition Testimony of Todd Goodheart – April 6, 2023

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Deposition Testimony of Brian Kendrick – June 13, 2023

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Deposition Testimony of David Herbert – September 6, 2023

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Deposition Testimony of Todd Louis Mallet – February 1, 2022

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45:8 – 46:9

Respectfully submitted,

ROBERTS MARKEL WEINBERG BUTLER HAILEY PC

A handwritten signature in blue ink, reading "Laura M. Cabutto", is positioned above a horizontal line.

GREGG S. WEINBERG

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**ATTORNEY FOR DEFENDANT KENDRICK
TRANSPORT LLC**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served upon the parties by facsimile, messenger, regular U.S. Mail, certified mail, return receipt requested and/or electronic service, pursuant to the Tex. R. Civ. P. 21a this the 12th day of October, 2023.

A handwritten signature in blue ink, reading "Laura M. Cabutto", is positioned above a horizontal line.

Laura M. Cabutto